

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

UNITED STATES OF AMERICA §
§ NO. 2:19-CR-01
v. § Judges JRG/RSP
§
MARK MCLEAN FARMER §

ELEMENTS OF THE OFFENSES

You are charged in **Count 1** of the information with a violation of 21 U.S.C. § 846 (conspiracy to possess and possession with intent to distribute anabolic steroids), and in **Count 2** of the indictment with violation of 18 U.S.C. § 924(c) (use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime). The essential elements which must be proven to establish violations of these offenses are as follows:

Count 1

21 U.S.C. § 846

- First:*** That within the time frame alleged in the indictment, you and other persons, directly or indirectly, reached an agreement to distribute anabolic steroids, a Schedule III controlled substance;
- Second:*** That you knew of the unlawful purpose of the agreement;
- Third:*** That you joined in the agreement willfully, that is, with the intent to further its unlawful purpose;
- Fourth:*** That you knew or reasonably should have known that the scope of the conspiracy involved 50 grams or more of actual methamphetamine.

Count 2

18 U.S.C. § 924(c)

- First:*** That you committed the elements of a drug trafficking crime prosecutable in federal court, specifically the elements of Count 1 above;

Second: That you knowingly used, carried, or possessed a firearm; and

Third: That your use or carrying of the firearm was during and in relation to, or the possession of the firearm was in furtherance of, your drug trafficking crime.

Respectfully submitted,

JOSEPH D. BROWN
UNITED STATES ATTORNEY

/s/ Colleen Bloss
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Elements of the Offense has been served on counsel of record for the defendant via ECF on this, the 2nd day of August 2019.

/s/ Colleen Bloss
COLLEEN BLOSS